September 12, 2002

Mr. Gary Flamm Program Manager Energy Efficiency & Demand Analysis Division California Energy Commission 1516 9th Street Sacramento, CA 95814

Dear Gary:

As you probably read in the news, the 2001-02 California Legislature came to a rousing close on the last day of August with the adoption of a new state spending plan. And with that, the theater has gone dark and I'm back.

First, I would like to invite you and other staff members working on the SB 5X effort to take a brief tour of Sacramento to view first-hand the types of billboard structures employed by the member companies of the California State Outdoor Advertising Association (CSOAA). I think it is important as you consider adopting rules impacting these structures and their related electrical fixtures, you have first-hand knowledge. For the tour. I will rely on a Clear Channel Outdoor to make the necessary arrangements.

The Outdoor Advertising Association of America estimates there are about 400,000 billboards in the nation and in California, approximately 18,000 billboard structures that support roughly 26,000 billboard faces. Since all billboard operators are not members of the association, I cannot verify this number, but it sounds reasonable.

Approximately 10 percent of the state's billboard stock is not illuminated. Of those boards illuminated, these are the structures and wattage for each installation:

12x24 panel (poster)	1-400 watt Metal Halide Fixture
10x30 panel (bulletin)	2-400 watt Metal Halide Fixtures
12x40 panel (bulletin)	3-400 watt Metal Halide Fixtures
14x48 panel (bulletin)	4-400 watt Metal Halide Fixtures

Many of the fixtures are controlled by an innovative wireless two-way "paging" or "beeping" technology. The outdoor companies can and do monitor lighting outages, power surges, brownouts, and any changes in amperage on bulletin faces. For companies employing this technology, the benefit is that

lights can be "turned on" or "turned off" at any time by making a telephone call from any location and get an immediate response to demand.

The technology is utilized when a billboard face is not sold or is "blank." In this case, the boards are not illuminated again until the face is sold. Outdoor companies are also using a retrofit device, an *Astronomical Timeclock*, which automatically re-programs themselves to Daylight savings time, eliminating lights from burning in daylight hours.

Regarding hours of operation, there is an important distinction to be made here versus other forms of outdoor lighting. Virtually all poster and bulletin applications run from dusk to near midnight. Some fixtures are shutoff around 11:00pm, some extend to 1:00am. In very few instances, some billboard customers, especially on freeways, require illumination during all night-time hours.

The reason this is so important is that this industry, while dependent on electricity, does not have an impact on the state's peak demand. And I believe this is the primary reason Senator Sher authored SB 5X in 2001. Ironically, for the last two years, Governor Davis's *Flex Your Power* peak demand reduction program has utilized billboard faces donated by the industry.

You will hear from some that fixtures should be top-mounted, rather than at the base of the board. This poses a maintenance nightmare to change lamps and also change copy on the board's face. Also, during daylight hours, top-mounted fixtures can cast shadows on the face and distort copy.

The outdoor advertising industry is one that is depends on how its consumers react to what they read. In areas where there is little ambient light, wattage on fixtures can and are reduced. But in urban areas where *light competition* exists, billboard operators must be able to effectively advertise the message sold to its customer.

Our industry constantly looks for ways to reduce costs, electrical use being a good example. The manufacturers of electrical fixtures have done the same thing. We have come along way from the days of fluorescent illumination. It is important the CEC, in their deliberations in this matter, consider issues that would negatively impact the California outdoor advertising industry by requiring changes in operation that result in little savings to overall peak demand, but significantly alter the way people view billboards. I trust the measures you consider will prove to be cost-effective and employ technology that is readily available to our member companies.

Mr. Gary Flamm September 12, 2002 Page Three I look forward to our next opportunity to get together.

Sincerely,

Jim Cassie

cc: Commissioner Robert Pernell Commissioner Art Rosenfield Bill Pennington, EDAD Member Companies, CSOAA